

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA)	CASE NO. 1:17CR513
)	
Plaintiff)	JUDGE CHRISTOPHER BOYKO
)	
-vs-)	
)	
ISIDORO GONZALEZ)	<u>DEFENDANT’S MOTION TO</u>
)	<u>CONTINUE TRIAL</u>
Defendant)	

Counsel moves the court to continue the trial of this matter, currently set for January 28, 2019.

Counsel and the government have been involved in negotiating the matter to a conclusion and have made significant progress. Counsel believes additional time will likely result in the matter being resolved by way of a negotiated plea. Additionally, counsel seeks time to review those portions of the recently signed “First Step Act” as it applies to Career Offender issues. The defendant may have the necessary prior convictions to be considered a Career Offender, but counsel has been made aware of some adjustments in Career Offender definitions, etc., that cause him to ask for more time and to proceed cautiously on this important issue.

Respectfully submitted,

s/Brian R. McGraw
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S E R V I C E

I hereby certify that on January 9, 2019, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail.

S/ Brian R. McGraw
BRIAN R. McGRAW (0036799)
Attorney for Defendant